

DATA REQUEST #26
WASTE MANAGEMENT

BACKGROUND

Appendix K (Phase I Site Assessment) of the SPPE recognizes that (a) portions of the proposed site were used for agricultural production as far back as 1945, (b) recorded easements for onsite utility pipelines date back to 1929 and (c) easements for onsite electric substations were granted as early as 1954. These historic uses and activities occurred well before current environmental regulations and could have resulted in the release of hazardous substances at the site, posing a risk to human health or the environment. Potential hazardous substances might include, but not be limited to, various pesticides from agricultural activities in that era including Chlordane, Toxaphene, Lindane, Endosulfan, DDT (and DDE, DDD) and arsenic, petroleum based fuels and PAHs from pipelines, and polychlorinated biphenyls (PCBs and chlorinated hydrocarbon contaminants PCDDs and PCDFs).

A Phase II Environmental Site Assessment (following ASTM guidelines), and any remediation, if necessary, should therefore be conducted prior to construction of the project.

DATA REQUEST

26. Please provide an expanded Phase I ESA addressing all underground linear facilities.

DATA RESPONSE

26. URS conducted a Phase I ESA of the southern half (80 acres) of the IID-owned 160-acre Property; as stated in the Executive Summary of Appendix K: "The subject property is identified by the following Assessor's Parcel Number (APN) 021-160-14. Parcel 021-160-14 consists of approximately 160 acres. The subject property is located on the southern 80 acres of the parcel and consists of relatively flat land that generally slopes toward the northeast."

There are currently two underground linear facilities associated with the Project. The first is a water supply lateral that runs north from the Project Site to the existing Golden State Water Company (GSWC) water line. This new lateral will interconnect with the GSWC line within the 80-acre portion of the Property, as shown in Figure 2.2-2 of the SPPE. Because this water lateral is entirely within the area that was originally addressed in the Phase I ESA, URS does not feel that an expanded Phase I ESA addressing this linear is warranted.

The second linear associated with the Project is a natural gas lateral that will tie in to the Southern California Gas Company (SCGC) regulating station, which is located on the southeast corner of Beal and Cuff Roads, as shown in Figure 2.1-2 of the SPPE. The final

Docket Number 01-SPPE-06
First Round Data Requests
Niland Gas Turbine Plant
April 2006

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WASTE MANAGEMENT

location of this linear is expected to fall within the public right-of-way underneath Beal Road running to the west, then turning north into the Project Site. When conducting a Phase I ESA, it is not typical or customary that public rights-of-way are included in the evaluation. That said, it is worth noting that, while the road itself was not technically included in the 80-acre evaluation, for intents and purposes, it is a part of URS' analysis by virtue of the fact that it is immediately adjacent to the 80-acre parcel. Additionally, the environmental database search information extends out from the Project Site for up to a mile, therefore if there were any "recognized environmental conditions" (as defined in the ASTM standard), they would likely have been revealed in the radius map search. That portion of the natural gas linear that will be located within the IID Property was covered in the original Phase I ESA analysis. Therefore, Applicant does not feel that an expanded Phase I ESA addressing this linear is warranted.